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November 20, 2019

By ECF

Hon. Paul G. Gardephe
United States District Court
Southern District of New York
40 Foley Square, Room 2204
New York, NY 10007

Re: Vernon v. Jordache Enterprises Inc., et al.
Case No. 19-cv-5421 (PGG)

MEMO ENDORSED

The conference on Nov.
21, 2019 is adjourned to
November 25, 2019 at
10 a.m.
Paul G. Gardephe
Nov. 20, 2019

Dear Judge Gardephe:

We represent defendants Jordache Enterprises, Inc., Katy Zilinski, and Hayley Nerenberg ("Defendants") in connection with the above-referenced action. Defendants write to advise the Court of my unavailability for the initial conference scheduled for tomorrow, November 21, 2019.

Pursuant to Your Honor's Individual Rules (VII)(A), the attorneys who will serve as principal trial counsel must appear at all court conferences. I will serve as principal trial counsel for Defendants in this action, but am not available to appear for the conference on November 21. Beginning today, November 20, I will be participating in the Women's Forum Global Meeting in Paris, France, which was planned long in advance to Your Honor's scheduled appearance. On November 21, I will be a panelist in "Making it Count – A Conversation about Quotas to Accelerate Inclusion." Leading up to this week, I participated in the planning of the conference beginning in the Spring of this year, researched my position of advocating for the use of quotas, prepared a PowerPoint, and rehearsed with the other panelists in preparation for the discussion. My participation has been advertised by the Conference via social media to its 27,000 followers and in the printed agenda. The full Agenda is attached for your review. All my travel arrangements, including hotel and flights, have been made and paid for in advance. I am also hosting two corporate clients at the conference.

My office has contacted opposing counsel, Silvia Stanciu, Esq., to discuss the conflict, obtain her consent to request an adjournment of the initial conference and to confirm her availability on alternate dates for Your Honor to consider. Ms. Stanciu consented to an adjournment. Both sides are available all day on Monday, November 25, and on Tuesday,

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November 26 in the morning (Plaintiff's counsel has a telephonic court conference in another matter on 3:30pm that day).

Thank you for your consideration.

Respectfully submitted,

GORDON REES SCULLY
MANSUKHANI, LLP

Mercedes Colwin
Mercedes Colwin

Cc: All Counsel of Record (via ECF)